



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

E.C.
5/31/05

MAY 31 2005

By Facsimile and Certified Mail
Return Receipt Requested

REPLY TO THE ATTENTION OF

Nordenia, Inc.
c/o: Julie O'Keefe, Esq.
Armstrong Teasdale LLP
One Metropolitan Square
Suite 2600
St. Louis, MO 63102-2740



C-14J

Re: RRG/Clayton Chemical Co. Superfund Site (Sauget, IL)/Response to April 7, 2005 Nordenia Letter on Waste Allocation Determination by U.S. EPA

Dear Ms. O'Keefe:

The United States Environmental Protection Agency (U.S. EPA) is in receipt of your letter of April 7, 2005. I have had the opportunity to consider the assertions that you have made involving the calculation of a waste share allocation to your client of 67,551 gallons of waste material sent to the RRG/Clayton Chemical Co. Superfund Site (Site), and to check with my enforcement team and our contractor in this matter. We have determined that your calculation of 67,551 gallons of waste (based upon the numbers presented in your letter) is correct. However, this does not change your client's overall status as a Potentially Responsible Party (PRP) at the Site.

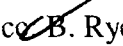
The remaining concern that you raise, is really a matter that may need to be resolved by you contacting the PRP Group that formulated the August 2004 RRG/Clayton Liquids Removal Investigation Report (Report). U.S. EPA is willing to consider removing Nordenia from its defined group of major contributing PRPs of over 75,000 gallons of waste material at the Site, if Nordenia can show that it has contacted the PRP 'Report' Group and received confirmation from them that the total waste amount attributed to Nordenia is based upon solely the records that you describe as having reviewed (at p. 2 of your April 7 letter). The principal contact for the PRP 'Report' Group, for our purposes, has been Ms. Margaret Coughlin, Dickinson Wright, PLLC, 3825 Woodward Ave., Suite 2000, Bloomfield Hills, MI 48304, phone no. 248/433-7272. The primary concern of U.S. EPA is working consistently and equitably with all identified and involved parties at this Site.

Please feel free to contact me with any comments or questions at 312/886-6613.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'Tom Turner', with a stylized flourish at the end.

Tom Turner
Associate Regional Counsel

cc  B. Ryczek, Enf. Spec. (SE-5J)
U.S. EPA

K. Turner, OSC (SE-5J)
U.S. EPA